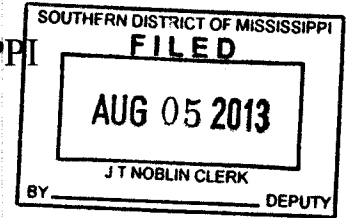


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



DOUGLAS HANDSHOE )

v. )

Civil Action No.1:13cv251-LG-JMR

AARON F. BROUSSARD, DANIEL ABEL )  
CHARLES LEARY, VAUGHN PERRET )  
CHRIS YOUNT, TROUT POINT LODGE )  
LIMITED, NOVA SCOTIA ENTERPRISES, )  
LLC )

PLAINTIFF'S BRIEF IN OPPOSITION TO DEFENDANTS LEARY, PERRET AND TROUT  
POINT LODGE, LIMITED'S MOTION FOR PROTECTIVE ORDER

1.

COMES NOW Plaintiff in response defendant Leary, Perret and Trout Point Lodge, Limited's Motion and Memorandum for Protective Order and in support shows.

2.

On June 28, 2013 the honorable Magistrate Roper issued an order staying the proceedings (Document 18) which stated:

Uniform Local Rules for the Northern and Southern Districts of Mississippi (L.U.Civ.R, effective 12/1/2011 provides:

Filing a motion to compel arbitration, an immunity defense or a jurisdictional defense motion stays the attorney conference and disclosure requirements and all discovery not related to the issue pending the Court's ruling on the motion, including any appeal.

Proceedings in this are therefore stayed pursuant to the Local Rules

3.

On July 15, 2013, Plaintiff served Interrogatories, Request for Production of Documents and Request for Admission of Facts which dealt exclusively with issues currently pending the Court's ruling on Motion, including the improper removal by Defendants Leary, Perret and Trout Point Lodge, Limited of the instant case from the Circuit Court of Hancock County Mississippi.

4.

Defendants now seek to rewrite the court's order which expressly stated the court's intent with respect to discovery matters. Defendants are well intelligenced to read and comprehend what the court instructed.

5.

Additionally defendant Yount has refused to accept postal delivery of these documents, which were sent to the address he filed with this honorable court for service of court filings. Upon knowledge and belief Plaintiff avers the address listed by Yount with this honorable court is a structure that is under complete renovation and is uninhabited / uninhabitable. Defendant Yount is evading service of process in this instant matter.<sup>1</sup>

#### CONCLUSION

Accordingly, defendants' Leary, Perret and Trout Point Lodge, Limited Motion for a Protective Order should not be well taken by this honorable court and denied.

Respectfully submitted



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Plaintiff, Propria Persona  
Douglas Handshoe  
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(228) 284-0004  
earning04@gmail.com

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<sup>1</sup> Plaintiff notes defendant Yount's Joinder in Document (document 8) was mailed to the court by defendant Abel, from his law office at the Super 8 Motel at the intersection of Clearview Parkway and Interstate 10 in Metairie Louisiana.

### CERTIFICATE OF SERVICE

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing motion and affidavit to the following via United States Mail:

Aaron F. Broussard #32234-034  
Butner Low FCI  
Post Office Box 999  
Butner, NC 27509

Chris Yount  
160 Metairie Lawn Dr  
Metairie, LA 70001

Daniel G. Abel  
C/O The Super 8 Motel / Desai Enterprises  
2421 Clearview Parkway, Room 106  
Metairie, LA 70001

Henry Laird, Jones Walker  
2510 14th Street, Suite 1125  
Gulfport, MS 39501  
Attorney for Trout Point Lodge Limited,  
Charles Leary and Vaughn Perret

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing motion and affidavit to the following via Electronic Mail:

Craig J. Geraci, Jr.  
Kahn Swick & Foti, LLC  
206 Covington Street  
Madisonville, Louisiana 70447  
Attorney for Nova Scotia Enterprises, LLC  
[Craig.Geraci@ksfcounsel.com](mailto:Craig.Geraci@ksfcounsel.com)



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